

**From:** "Edwards Tree Farm" <edtreefarm@jps.net>  
**To:** "Dave Carlson" <dcarlson@waterboards.ca.gov>, "Pat Leary" <pleary@waterboards.ca.gov>  
**Date:** 9/26/2007 10:24:05 AM  
**Subject:** Colfax NPDES draft permit comments

September 26, 2007

Dear Mr Carlson and Ms Leary,

Below are our comments on the August 7, 2007 draft NPDES permit for the City of Colfax Waste Water Treatment plant.

Comments 1 through 10 are connected with continuing problems at the Colfax sewage system. The format for these comments is as follows:

- a.. First, the problem area that the permit should address
  - b.. Second, the permit's response to this problem area, if any
  - c.. Third, the response to this specific problem that should be added to the CDO and/or the permit.
- Comments 11 through 27 are additional comments relating to other errors, omissions, and problems with the draft.

Please provide us with your response to these comments at the earliest possible date. If you have any questions please call us at 530-637-4211.

Thank you,

Allen and Nancy Edwards

Comments:

1. Problem: The current plant does not adequately treat sewage from the City of Colfax.

- a.. The tertiary components of the plant have a backwards operation order of operations that does not adequately disinfect the effluent;
  - b.. The plant has experienced a buildup of solids that has caused excesses of ammonia, sewage odors downstream, and possibly other problems. The system has no mechanism for disposing of these solids;
  - c.. Current plant discharges all inflows to Smuther's ravine - in violation of the current permit, which requires that all treated effluent except leakage from the storage reservoir be disposed on site through the irrigation system. The current system was allow to operate (by Board staff) for a very short time - only to dewater the storage reservoir in preparation for lining it. This draft permit regards the current system as an "interim compliance" system for complying with the 2001 CDO even though there was no public review and no formal Board approval for using this system for that purpose.
  - d.. State Water Board staff have indicated that the city is now intending to keep the interim system as a backup for the new facility, so it will be operated at times in the future even when the new facility is operational. This would be a violation of the EIR for the plant upgrade, and leave in place a treatment facility that has repeatedly proven to be inadequate.
- Draft Permit response:

- a.. The draft states that the interim plant was installed in response to the 2001 CDO requirement to upgrade the plant. This statement is untrue -- the city's documents are clear that the current configuration was put in place solely to dewater pond three (the main storage reservoir). In addition, the city committed

Outside Scope of Hearing